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April 12, 2021

VIA ECF ONLY

Hon. Naomi Reice Buchwald, U.S.D.J.
Daniel Patrick Moynihan
United States Courthouse
Southern District of New York
500 Pearl Street, Courtroom 21A
New York, New York 10007

Re: Eric Elliott (p/k/a “Fly Havana”) v. Joseph Anthony Cartagena (p/k/a “Fat Joe”), et al., Case No. 1:19-cv-01998 (NRB)

Dear Judge Buchwald:

We are counsel for Defendants Joseph Anthony Cartagena (p/k/a “Fat Joe”); Reminisce Smith Mackie (p/k/a “Remy Ma”); Joey and Ryan Music; Remynisce Music; Sneaker Addict Touring LLC; Terror Squad Productions, Inc.; Terror Squad Entertainment; RNG (Rap’s New Generation); Warner Chappell Music, Inc.; and Warner-Tamerlane Publishing Corp. (collectively, “Defendants”) in the above captioned action.

Pursuant to Your Honor’s Individual Rule 2(E)(1), Defendants respectfully submit this letter in conjunction with their opening memorandum of law in support of their Renewed Motion for Summary Judgment (the “Motion”). Pursuant to the Court’s July 31, 2020 Order, which denied Defendants’ Motion for Summary Judgment without prejudice, Defendants were “granted leave to renew [the] motion on the existing motion papers at such time they conclude that they have secured non-hearsay evidence from [Elis] Pacheco sufficient to meet the requirements of Rule 1004(a) and have filed that evidence as a supplement to the existing motion papers.” ECF Doc. No. 166, at 12-13. In accordance with the Court’s instructions, the Motion is identical to the prior submission on summary judgment (*see* ECF Doc. No. 147), with the exception that certain points have been supplemented to reflect the attempts to procure a sworn statement from Mr. Pacheco. Such supplemental material is specifically identified in the Motion papers.

We thank the Court for its attention to this matter.



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Respectfully submitted,

A handwritten signature in blue ink that reads "Eleanor M. Lackman".

Eleanor M. Lackman
Partner of
MITCHELL SILBERBERG & KNUPP LLP

EML/eln

cc: All Counsel of Record (via ECF)